



REPORT TO THE LEGISLATURE:

**NH DEPARTMENT OF ENVIRONMENTAL SERVICES
POLLUTION PREVENTION PROGRAM**

JANUARY 1997 - DECEMBER 2000

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**REPORT TO THE LEGISLATURE
DEPARTMENT OF ENVIRONMENTAL SERVICES
NH POLLUTION PREVENTION PROGRAM
JAN. 1997-DEC. 2000
EXECUTIVE SUMMARY**

I. POLLUTION PREVENTION LEGISLATION

Chapter 8 of the Laws of 1996 established a pollution prevention program in the New Hampshire Department of Environmental Services (Department), known as the NH Pollution Prevention Program (NHPPP). The bill requires the Department to provide a report to the legislature on pollution prevention activities within the state. This report covers the period from January 1, 1997 through December 31, 2000. The statistics and numbers provided in this report are for that period, unless otherwise noted.

While the Department has had a pollution prevention program in place since 1991, the 1996 law (RSA 21-0:15) formalized the Department's pollution prevention efforts and gave the Department a clear legislative directive to pursue *prevention* as the preferred approach to environmental protection. The law provides funding for the Pollution Prevention (P2) Coordinator and the P2 Program Manager, both full time positions within the Department.

II. WHAT IS POLLUTION PREVENTION

Pollution prevention reduces or eliminates waste *at the source*, avoiding the *generation* of waste. Most of the Department is concerned with helping companies and organizations manage wastes that are created as a result of their business processes, ensuring these wastes do not pollute the environment. NHPPP, however, looks at the processes generating the waste and asks "can we eliminate or reduce this waste, or make it less toxic?" P2 protects the environment by reducing the risk of toxic releases and, at the same time, saves NH companies money by avoiding waste handling and treatment costs. SB133 recognizes that pollution prevention can result in positive economic benefits for business by reducing costs and improving efficiency.

III. NEW HAMPSHIRE POLLUTION PREVENTION PROGRAM (NHPPP)

NHPPP (located within the Waste Management Division) promotes P2 in the regulated community and coordinates P2 within the Department's media specific (water, air, waste) programs. This group works closely with the P2 Coordinator, who is housed in the Commissioner's Office within the Department. For the sake of simplicity, in this report, the P2 Coordinator is considered part of NHPPP. NHPPP offers non-regulatory, free, confidential assistance to New Hampshire businesses, municipalities, public agencies, organizations and residents. NHPPP primarily serves small businesses to address their environmental needs, but also works with medium and large sized companies and organizations. NHPPP assists

businesses through a wide variety of activities, including outreach, site assistance, information research and education that are described in this report.

Although smaller than other New England P2 programs, NHPPP provides the same services to its clients. The table below provides information on the number of P2 Full Time Equivalents (FTEs)¹ in the New England states. EPA-New England has repeatedly stated they are pleased with the level of output from such a small program and have a strong working relationship with NHPPP. On January 23, 2001, Dwight Peavey, Ph.D., EPA-New England's Small Business Ombudsman, sent a letter to Philip J. O'Brien, Ph.D., the Department's Waste Management Director, stating:

"...My colleagues and I have always enjoyed a productive and positive relationship with the NH P2 program. I have been impressed by the outcomes that have resulted from the ambitious projects undertaken by the NH P2 Program. I also appreciate the fact that NH consistently produces excellent work products that have improved the environmental performance of various industrial sectors. Although NH has a small P2 staff, compared with other New England states, the volume of valuable outreach materials, on-site assistance, and P2 education provided to many important sectors has been remarkable. With limited funds, NH has always made the most of the grant money provided to the program."

State	Number of Pollution Prevention Employees (FTEs)[*]
New Hampshire	3.5
Connecticut	15
Maine	5
Massachusetts	30 (Office of Technical Assistance) 22 (Toxics Use Reduction Institute)
New York	17 (DEC Pollution Prevention Unit) 7 (Erie County Office of Pollution Prevention)
Rhode Island	8
Vermont	9

^{*}FTEs measure staffing normalized to full time positions. I.e., 2 FTEs = 2 full time employees or 4 half time employees.
Source: *Northeast States P2 Roundtable: Directory of Participating Programs*, NEWMOA 2000.

IV. BENEFITS TO NH BUSINESS

P2 benefits NH business. Traditional thinking dictated that businesses couldn't meet their environmental responsibilities without adversely affecting their ability to make a profit. P2 has shown the opposite to be true; NH companies have used P2 to improve their bottom line. Companies that embrace P2 actually outperform those that do not. NHPPP is in the rare position of being able to improve both NH's environment and its economy, simultaneously. P2 helps NH businesses be more competitive by:

¹ FTE's measure staffing normalized to full time positions. I.e., 2 FTEs = 2 full time employees or 4 half time employees.

1. eliminating the generation of waste;
2. using raw materials more efficiently;
3. improving worker health and safety;
4. increasing production efficiency; and,
5. decreasing regulatory burdens.

One of the best ways for businesses to explore their pollution prevention options is to contact NHPPP, which provides confidential P2 assistance anywhere in the state.

V. FUNDING

NHPPP is currently funded from three different sources: the State's Hazardous Waste Cleanup Fund, USEPA grants, and the State's general funds. The Cleanup Fund provides 52% of NHPPP's funding, as provided by law. These funds support two, full-time positions (the P2 Coordinator and the P2 Program Manager) and are used mostly for salaries and benefits. EPA's Pollution Prevention Incentives for States (PPIS) grant monies comprise 38% of NHPPP's funding. These monies are granted to the Department to perform specific projects that focus on various industry sectors each year. These monies, however, do not fund working project budgets (such as printing costs, conference costs, etc.) since these funds support two part time position salaries and a summer intern. The remaining 10% of NHPPP's budget comes from State general funds and is used to support one half of the group's supervisory position. Each of these funding sources is absolutely critical to the state's P2 program.

NHPPP needs continued funding for existing programs and services that assist NH business (see VI. Program Activities, below) and additional funding to address important emerging issues, such as eliminating hazardous materials in NH schools. EPA-New England has also recommended expanding NHPPP (see Section VI, J). The issue of hazardous wastes in schools, for example, has received national attention, but not funding. Several studies in New England show that our school children are at risk from improperly stored chemicals in their schools but most schools lack the expertise or funding to address the issue. In 1999, NHPPP requested federal monies to provide P2 outreach and clean out of hazardous material (including mercury) in NH schools, but funding was denied.

VI. PROGRAM ACTIVITIES

NHPPP achieves its goals through a variety of strategies, core functions, activities and special projects. Described in more detail in the body of this report, these include the following.

- A. Assistance to the Regulated Community** During the reporting period, NHPPP provided confidential **on-site assistance visits** to 31 NH businesses, ranging in size from 3 to 600 employees. During these visits, NHPPP reviewed the business' hazardous and solid waste-generating processes in order to identify pollution prevention opportunities. Stakeholders also contact NHPPP staff for **telephone assistance** via a toll-free line at 1-800-273-9469. During the reporting period, NHPPP provided technical **assistance to 780 callers** and provided **4,170 documents** in response to their requests. NHPPP also

performed **P2 Training** via 64 training sessions, presentations, and display booths to approximately **3,500 members of the regulated community** and **NH citizens**. Many businesses are now online and seek business and technical information over the Internet. To address this audience, NHPPP hosts an up-to-date **website** at: www.des.state.nh.us/NHPPP.

- B. Partnerships** - As required by law, NHPPP uses partnerships to leverage additional resources and expertise. NHPPP has a long history of building strong partnerships with organizations that complement each other's skills. Stated simply, partnering with other assistance providers makes NHPPP more valuable to its stakeholders. NHPPP commonly partners with: **EPA-New England**; the **University of New Hampshire**; the **Business and Industry Association's WasteCap** Resource Conservation Network (WasteCap); **Dartmouth Hitchcock Medical Center**; the **NH Small Business Development Center**; the **Governor's Office of Energy and Community Services**; the **NH Hospital Association** (NHHA) and **NEWMOA**. As an example, in 1998, NHPPP partnered with NHHA to provide a waste reduction workshop for hospitals; 65 members of NH's healthcare community attended, representing 21 hospitals.
- C. Mercury Reduction** - Reducing the use of mercury and mercury emissions in NH is a major goal of the Department. EPA- New England presented DES with the **2000 Environmental Merit Award** in recognition of its mercury reduction efforts. NHPPP was instrumental in the early development of the 1998 *New Hampshire Mercury Reduction Strategy* that recommends pollution prevention strategies to eliminate sources of mercury. In June of 1999, Governor Jeanne Shaheen established the **Mercury Reduction Task Force** to implement the *NH Mercury Reduction Strategy*. The P2 coordinator co-chairs this Task Force and NHPPP has been closely involved with Task Force activities. Under the Task Force, NHPPP chaired the **Mercury Public Outreach & Education** and **Mercury in Healthcare Facilities** workgroups. Also in 1999, the Department formed the **P2 in Healthcare** partnership to implement mercury reduction projects within the healthcare setting. **Governor Jeanne Shaheen** signed **HB 526 and 1418** in January and June of 2000, respectively, reducing the amount of allowable mercury emissions for large municipal waste incinerators and prohibiting the sale of mercury added products in the state. In June 2000, NHPPP provided a **Hospital Conference** to raise awareness of mercury issues within the healthcare setting; more than 60 members from 30 healthcare institutions participated.
- D. Annual Outreach Events** - Each spring since 1995, the **NH Governor's Award for Pollution Prevention** has recognized businesses, industries and other organizations for successfully reducing or eliminating waste at the source. Winners have included small companies with as few as six employees, hospitals, municipalities, and some of the largest businesses in the state. For the past nine years, NHPPP and UNH have provided the **Annual P2 Conference** with assistance from many other partners. **Governor Jeanne Shaheen** has presented the Governor's Awards at this conference every year during the reporting period. Each year, NHPPP coordinates the **Pollution Prevention Partnership** with the University of New Hampshire (UNH) to offer a **summer internship program** to NH companies and organizations. To date, 65 interns have been

placed at 37 companies and organizations in NH, **saving them more than \$2.5 million** through P2 projects.

- E. Small Business** - NHPPP assists businesses of any size in NH, but is particularly interested in assisting small businesses that typically lack resources to address P2 and regulatory issues. In 1998, NHPPP partnered with UNH's Chemical Engineering Program, the NH Small Business Development Center (SBDC), EPA-New England, and others, to form the **Small Business Environmental Assistance Alliance (SBEA2)** to ensure that P2 and environmental assistance programs in New Hampshire are networked to more efficiently provide expertise and resources to NH businesses. In 1999, NHPPP used part of their grant monies from USEPA to fund the **Small Business Development Center Environmental Counselor** to assist NH small businesses with pollution prevention activities. Educating small businesses on pollution prevention techniques complements the financial assistance the SBDC already provides to the small business community in NH. NHPPP also provides P2 expertise to assist the **Small Business Technical Assistance Program (SBTAP)**, a non-regulatory program within the Department that helps businesses understand and comply with Clean Air Act regulations.
- F. Environmental Management System (EMS and ISO 14000)** – An **EMS** is a formal set of procedures and policies that defines how an organization will manage its potential impacts on the environment, and the health of its workers and the community. In response to the needs of small business, NHPPP developed the **P2 Planning Guide** to assist NH businesses with reviewing their environmental performance and identifying P2 opportunities. The Guide, titled “Planning for Profits,” is a straightforward “How To” manual that allows small businesses to design and implement a simplified, P2-based environmental management system.
- G. Publications/Productions-** Some of NHPPP's most effective outreach tools are its numerous publications and productions. During the reporting period, over **45,000 P2 documents** created by NHPPP and other organizations were distributed throughout NH. *Wastelines*, NHPPP's quarterly newsletter, has been published and distributed since 1993. *Wastelines* is available in hard copy, or on NHPPP's website located at: <http://www.des.state.nh.us/NHPPP/wlnews.htm>. During the reporting period, 14 issues of *Wastelines* have been published, and more than 12,000 newsletters have been distributed. NHPPP has worked with many different industrial sectors. For instance, it has worked to decrease the generation of wastes associated with automotive repair and servicing. NHPPP developed an **automotive curriculum and teaching manual** for NH's vocational schools and technical colleges, as well as a technical manual, *PitStops*, for automotive service garage technicians. In 1997, NHPPP partnered with UNH and USEPA to produce a **Metal Finishing Video** to assist metal finishers in reducing waste at the source. For a more general audience, NHPPP created four **EcoWatch Spots** for television during the reporting period. Eco Watch is a 40 second public service message shown throughout the day for a period of about two weeks.
- H. Regulatory Integration** – NHPPP strives to make sure the Department “**practices what they preach.**” NHPPP performs a number of activities aimed toward incorporating P2

into daily routines within the Department and into job activities of its employees. At Commissioner Robert Varney's request, NHPPP has **trained all 450 Department staff** in P2 concepts. Each media specific division in the Department incorporates P2 concepts. In May of 1992, a multi-media **Pollution Prevention Task Force** (Green Team) was created to foster P2 within the Department. In addition, the **Green Team** coordinates recycling and some P2 activities within the Department and **P2 Week** has been celebrated within the Department every year since 1997.

- I. **Regional/National Efforts**– NHPPP coordinates with and supports other states' P2 related activities through several regional and national organizations. These include the **Northeast States Waste Management Officials Association (NEWMOA)** that coordinates regional P2 activities among state environmental regulatory agencies, hosts regional meetings, and develops technical resources for the P2 community. NHPPP is a member of the **National Pollution Prevention Roundtable (NPPR)** that coordinates P2 activities on a national and international level and hosts two conferences annually in the US. NHPPP is also a contributing member to several P2 project coordinated by other national organizations such as the **Association of State and Territorial Solid Waste Management Officials (ASTSWMO)** and the national **Multi-State Workgroup (MSWG)**.

VII. P2 IN THE NEW MILLENNIUM

Pollution prevention assistance has evolved considerably since the concept first became widely known in the early 1990's. State and federal agencies need to be able to address changing environmental issues as well as changing customer needs. In the new millennium, NHPPP will need to **focus on certain key areas** to provide the best protection for New Hampshire's environment while ensuring optimum performance by its customers. These include:

- **Comprehensive Environmental Management Systems (EMSs)**

Today, companies are developing comprehensive EMSs that are designed to replace individual programs in order to better address environmental regulatory issues, quality management, pollution prevention and worker health and safety. For example, Nike, Inc. requires their manufacturers to develop and implement "Environmental Health and Safety Management Systems" that will improve their performance while supporting Nike's overall ecological goals.

- **Merging of Compliance and Technical Assistance Efforts**

Traditionally, state and federal environmental personnel have been divided into two groups: regulatory compliance staff, the "black hats," who act as environmental police, and the assistance staff, the "white hats," who generally provide confidential assistance and advice without the threat of regulatory fines and penalties. Today, the black hats are increasingly providing assistance without enforcement, and the white hats are providing more regulatory information along with their pollution prevention assistance.

- **Focus on Persistent Bioaccumulative Toxics (PBTs) through Risk Assessment**

Limited agency resources control the amount of assistance and enforcement that can be provided. Therefore, agencies need to selectively focus their efforts on issues that are most important to their stakeholders and provide the greatest environmental and public health benefit. Using information from risk assessments is one way to focus these efforts. The trend of effectively focusing limited NHPPP resources on the most important environmental and health issues, like Persistent Bioaccumulative Toxics (PBTs), will continue in the future.

VIII. CONCLUSION

New Hampshire is getting an **extremely good return on its investment** by funding NHPPP. NHPPP has similar outputs to other New England states' P2 programs that have at least twice the staff and budget. NHPPP needs to maintain its current level of funding to continue programs that **address the needs of NH's small business community** and needs **increased funding** to **address emerging issues** and initiatives, such as hazardous wastes in our schools and implementation of the Department's February 2001 *New Hampshire Dioxin Reduction Strategy*. NHPPP should also be ready to address emerging issues within the state and new initiatives in conjunction with EPA-New England.

Pollution Prevention clearly **benefits both NH businesses and the environment**. NH companies are using P2 and Environmental Management Systems today **to increase their profits**. P2 helps companies **improve their bottom line** by **eliminating** waste and wasteful practices and by encouraging a **more efficient use of raw materials** and resources (including water and energy). P2 protects the environment by reducing or eliminating hazardous waste generation, toxic water discharges and hazardous air emissions. One of the best ways for businesses to explore their pollution prevention options is to **contact NHPPP**.

REPORT TO THE LEGISLATURE NH DEPARTMENT OF ENVIRONMENTAL SERVICES POLLUTION PREVENTION PROGRAM JANUARY 1997 - DECEMBER 2000

I. POLLUTION PREVENTION LEGISLATION



Chapter 8 of the Laws of 1996 established a pollution prevention program in the Department of Environmental Services (Department), known as the NH Pollution Prevention Program (NHPPP). The bill requires the Department to provide a report to the legislature on pollution prevention activities within the state. This report covers the period from January 1, 1997 through December 31, 2000. The statistics and numbers provided in this report are for that period, unless otherwise noted.

While the Department has had a pollution prevention program in place since 1991, the 1996 law formalized the Department's pollution prevention efforts and gave the Department a clear legislative directive to pursue prevention as the preferred approach to environmental protection. The bill provides funding for the Pollution Prevention (P2) Coordinator and the P2 Program Manager, both full time positions within the Department.

The bill's findings recognize the value of pollution prevention because it eliminates, rather than treats pollution sources and is multi-media in approach. Additionally, the bill notes that pollution prevention can result in positive economic benefits for business by reducing costs and improving efficiency. The Department strives to provide high quality technical assistance to the business community, while integrating prevention concepts into its own operations and programs. This report describes what pollution prevention is, and provides a detailed accounting of the pollution prevention activities that have taken place over the reporting period.

II. WHAT IS POLLUTION PREVENTION

Pollution prevention reduces or eliminates waste *at the source*, avoiding the *generation* of waste. Traditionally, environmental regulatory agencies have used an "end-of-the-pipe" approach to environmental protection, ensuring that the waste once generated does not pollute our air, water and land. In response, industry has also taken an end-of-pipe approach towards managing their wastes, by installing emission scrubbers, using wastewater treatment technologies, hauling their hazardous waste offsite, etc. Pollution prevention offers regulatory agencies and the regulated community a tool to reduce pollution at the source instead of addressing the waste after it has been created.



Reducing or eliminating pollution at the source makes good sense from an environmental, as well as a fiscal, perspective and thus is a win-win situation for business, the Department, NH citizens, and the environment. Businesses save money by using raw materials more efficiently, using less hazardous materials, and reducing waste management costs. The Department saves money because pollution prevention helps companies achieve and maintain compliance, and it is

less time consuming (and therefore less expensive) for the Department to regulate companies that are in compliance with environmental laws. NH citizens and the environment win because pollution prevention can provide more effective protection for public health and the environment, since less waste is actually generated, reducing the chance of pollutants being released into the environment.

Pollution prevention also emphasizes a *multi-media* perspective, which considers the impacts of pollution on air, land and water simultaneously. This multi-media prevention approach is rapidly becoming a major focus of environmental protection efforts at all levels of government, and the private sector. Viewing pollution from a multi-media perspective means that pollution will not be shifted from one medium to another (e.g., water to air), without considering overall environmental impacts.

When a single media approach is taken, pollutants often get shifted from one media to another through treatment. One simplified example is using an air stripper to remove solvents from wastewater. The old approach would have been to install an air-stripper to remove the solvents from the water. However, the stripper sprays the solvent contaminated water into the air. This cleans the water, but releases (transfers) the solvent to the air. This is not the best approach for the business or the environment, because the stripper unit is expensive to purchase and maintain, and solvents get transferred from the water to the air. The multi-media pollution prevention approach would look upstream and analyze the process, possibly replacing the solvent with a non-hazardous material, alleviating the need for the air stripper altogether.

Pollution prevention concepts are based on elimination and reduction of waste, continuous improvement, and teamwork. Although the Department had a pollution prevention program in place since 1991, SB133 gave the Department a specific mandate to pursue prevention as the preferred approach to environmental protection. The Department of Environmental Services is committed to pursuing pollution prevention as an environmental protection measure wherever feasible and effective. In any case where pollution prevention options have been explored and found not feasible, recycling, treatment, and disposal options shall be examined, in that order.

It should be noted that, although the move toward pollution prevention continues to gain momentum, it is not an entirely new concept at the Department. There are many existing activities within the Department that emphasize or include elements of prevention. Pollution prevention is an evolutionary process, and existing activities form the building blocks of an overall effort to incorporate pollution prevention into all of the Department's functions, both regulatory and non-regulatory.



III. New Hampshire Pollution Prevention Program (NHPPP)

NHPPP (located within the Waste Management Division) promotes P2 in the regulated community and coordinates P2 within the Department's media specific programs. This group works closely with the P2 Coordinator, who is housed in the Commissioner's Office within the Department. For the sake of simplicity, in this report, the P2 Coordinator is considered part of NHPPP. NHPPP offers non-

regulatory, free, confidential assistance to New Hampshire businesses, municipalities, public agencies, organizations and residents. NHPPP primarily serves small businesses to address their environmental needs, but also works with medium and large sized companies and organizations. NHPPP assists businesses through a wide variety of activities, described in this report, that include outreach, site assistance, information research and education.

Although the NHPPP is located in the Waste Management Division, it is a multi-media program and works with the regulated community on waste, air and water issues. One example is the Governor's Mercury Reduction Task Force, composed of DES, business and environmental representatives who meet to implement the state's NH Mercury Reduction Strategy (discussed later in this report under the Sector Based Projects section). NHPPP staff work closely with other Departmental programs to draw from staff experience in those programs, such as the small business ombudsman in the Department's Air Resources Division, and the pretreatment coordinator in the Department's Water Division. The major activities of the NHPPP are described in the Core Activities Section, below.

While NHPPP is an extremely small group compared to other P2 groups in New England states, it accomplishes as much as other New England P2 programs that have at least twice the staff. The table below provides information on the number of P2 Full Time Equivalents (FTEs)² in the New England states.

State	Number of Pollution Prevention Employees (FTEs)*
New Hampshire	3.5
Connecticut	15
Maine	5
Massachusetts	30 (Office of Technical Assistance) 22 (Toxics Use Reduction Institute)
New York	17 (DEC Pollution Prevention Unit) 7 (Erie County Office of Pollution Prevention)
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* FTEs measure staffing normalized to full time positions. I.E., 2 FTEs = 2 full time employees or 4 half time employees.
Source: "Northeast States P2 Roundtable: Directory of Participating Programs" NEWMOA 2000

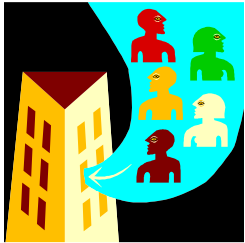
NHPPP has a strong working relationship with EPA-New England, which provides some funding annually. EPA-New England has repeatedly stated they are pleased with the level of output from such a small program. In a January 23, 2001 letter, EPA-New England's Small Business Ombudsman, Dwight Peavey, Ph.D., states:

"...My colleagues and I have always enjoyed a productive and positive relationship with the NH P2 program. I have been impressed by the outcomes that have resulted from the ambitious projects undertaken by the NH P2 Program. I also appreciate the fact that NH consistently produces excellent

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work products that have improved the environmental performance of various industrial sectors. Although NH has a small P2 staff, compared with other New England states, the volume of valuable outreach materials, on-site assistance, and P2 education provided to many important sectors has been remarkable. With limited funds, NH has always made the most of the grant money provided to the program.”

IV. BENEFITS TO NH BUSINESS



P2 benefits NH business. Traditional thinking dictated that businesses couldn't meet their environmental responsibilities without adversely affecting their ability to make a profit. P2 has shown the opposite to be true; NH companies have used P2 to improve their bottom line. Companies that embrace P2 actually outperform those that do not. NHPPP is in the rare position of being able to improve both NH's environment and its economy, simultaneously. P2 helps NH businesses be more competitive by:

- | | |
|--|--------------------------------------|
| 6. eliminating the generation of waste; | 9. increasing production efficiency; |
| 7. using raw materials more efficiently; | and, |
| 8. improving worker health and safety; | 10. decreasing regulatory burdens. |

One of the best ways for businesses to explore their pollution prevention options is to contact NHPPP, which provides confidential P2 assistance. NH businesses, such as Graphic Printers, of Salem, are using P2 to their competitive advantage.

NH Small Business (Graphic Printers) benefits from P2 project.

Graphic Printers is a small printing business with only six employees, located in Salem, NH. The company won a 2000 Governor's Award for Pollution Prevention for switching from conventional solvent-based printing inks to "stay open" inks. These types of inks dry via chemical reaction with the paper, instead of solvent evaporation, greatly reducing solvent and volatile organic compound (VOC) emissions to the air. Because these inks do not "skin over", they can be left in the presses for an indefinite period of time, reducing wash-up and loading time. Graphic Printers worked with their existing vendor to find and implement the conversion to stay open inks, which improved their product and increased profits.

Project benefits include:

- ☐ Savings of an estimated \$5000 in labor and cleanup costs;
- ☐ 85% reduction in the generation of waste ink and waste solvent ;
- ☐ reduced ink and solvent consumption (both are expensive);
- ☐ reduced hazardous waste disposal costs for both solvent and ink waste stream; and
- ☐ improved air quality and increased employee morale.

Jesse Kamien of Graphic Printers declares that this is the best drying ink he has ever used and highly recommends these inks to other printers.

V. FUNDING



NHPPP is currently funded from three different sources: the State's Hazardous Waste Cleanup Fund, EPA-New England grants, and the State's general funds. The Cleanup Fund provides 52% of NHPPP's funding, as provided through SB133. These funds support two, full-time positions (the P2 Coordinator and the P2 Program Manager) and are used mostly for salaries and benefits. EPA's Pollution Prevention Incentives for States (PPIS) grant monies comprise 38% of NHPPP's funding. These monies are granted to the Department to perform specific projects that focus on various industry sectors each year. These monies, however, do not fund working project budgets (such as printing costs, conference costs, etc.) since these funds support two part time position salaries and a summer intern. The remaining 10% of NHPPP's budget comes from State general funds and is used to support one half of the group's supervisory position. Each of these funding sources is absolutely critical to NH's P2 program.

NHPPP needs continued funding for existing programs and services that assist NH business and additional funding to address important emerging issues, such as eliminating hazardous materials in NH schools. EPA-New England has also recommended expanding the NH P2 Program (see Section VI. J). The issue of hazardous wastes in schools, for example, has received national attention, but not funding. In 1999, NHPPP requested federal monies to provide P2 outreach and clean out of hazardous material (including mercury) in NH schools, but funding was denied. Funding is needed to assist the many schools that do not have programs or budgets that provide proper storage and disposal of unwanted, unused, or out-of-date chemicals and are not in compliance with environmental regulations.

Several studies show that school children in New England are at risk from improperly stored chemicals in their schools. Vermont and Massachusetts environmental agencies have identified significant risks to human health and the environment from mercury and other hazardous substances improperly used and stored in their middle and high school labs. In Vermont, more than 260 pounds of hazardous materials (including an average of 10 pounds of mercury) were removed from EACH school participating in their program. The problem of mercury in the schools is particularly pervasive. The Burlington, MA Board of Health recently found elemental mercury needlessly being used in chemistry experiments, mercury salts being burned without ventilation hoods, and small amount of elemental mercury being handed out for the students to handle in both primary and secondary schools. There is no reason to believe NH schools have any fewer waste problems than these Massachusetts or Vermont schools. Adequate funding for these types of projects could greatly reduce risk to children, school employees and the environment. NH has approximately 240 middle and high schools.



VI. PROGRAM ACTIVITIES

NHPPP strives to integrate P2 into NH's industry, government and communities. NHPPP achieves its goals through a variety of strategies, core functions, activities and special projects, described below.

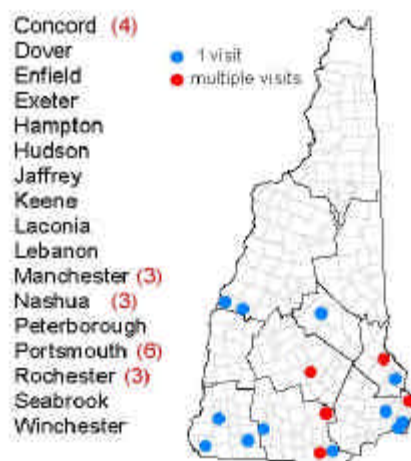
A. ASSISTANCE TO THE REGULATED COMMUNITY

NHPPP's main objective is to assist the regulated community to understand pollution prevention and incorporate P2 into their operations. The program does this through a number of efforts across the state as described below.

On-Site Assistance

NHPPP provides confidential site assistance visits to NH businesses. During these visits, NHPPP reviews the business' waste-generating processes in order to identify pollution prevention opportunities. Recommendations may include strategies such as substituting non-toxic (or less toxic) chemicals in place of hazardous substances, implementing best management practices, initiating in-process reuse and recycling, reducing reject rates for parts, or simple housekeeping tips. During the reporting period, the NHPPP provided on-site assistance to thirty-one companies across the state. These companies ranged in size from three to 600 employees. Industrial sectors visited included electronics, transportation, fabricated metal products, primary metal industries, rubber and plastics, and health services. Written reports, assistance with project implementation, and follow-up visits are provided to each business.

NHPPP On-Site Visits 1997-2000



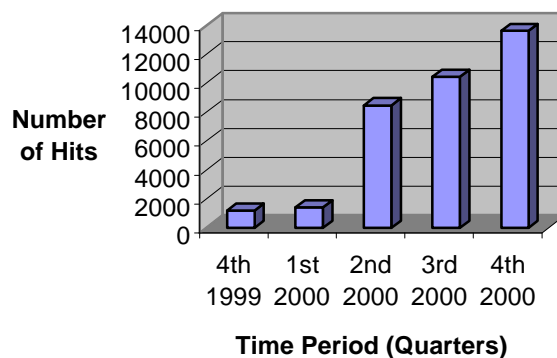
Website

Many businesses are now online and seek business and technical information over the Internet. To address this audience, NHPPP hosts an up-to-date webpage at: www.des.state.nh.us/nhppp.

NHPPP's website offers information on:

- General P2 information and what NHPPP has to offer;
- Program and projects, such as the Governor's Awards;
- Upcoming events, such as the annual P2 Conference and P2 Week;
- Publications, such as the NHPPP newsletter, *Wastelines*;
- Industry checklists for P2 and waste reduction tips;
- Where to find assistance;
- Hot topics, such as mercury;
- P2 tips for consumers;
- Safety in the workplace; and
- P2 information for the automotive, dental, hospital, marina and wood finishing sectors.

NHPPP Web Page Hits



Telephone Assistance

NHPPP also provides a large amount of technical and compliance assistance without going on-site. Members of the regulated community, or anyone in NH, may contact NHPPP staff to obtain information via the toll-free assistance line at 1-800-273-9469. Information on pollution prevention, new technologies, and regulatory issues is readily available with just a phone call. During the reporting period, NHPPP provided technical assistance to 780 callers, and provided them with 4,170 documents in response to their requests. This service has a good rate of return (about 20%) of satisfied customers who liked the information we sent them on one project or technology, and have requested additional information on another topic or technology.



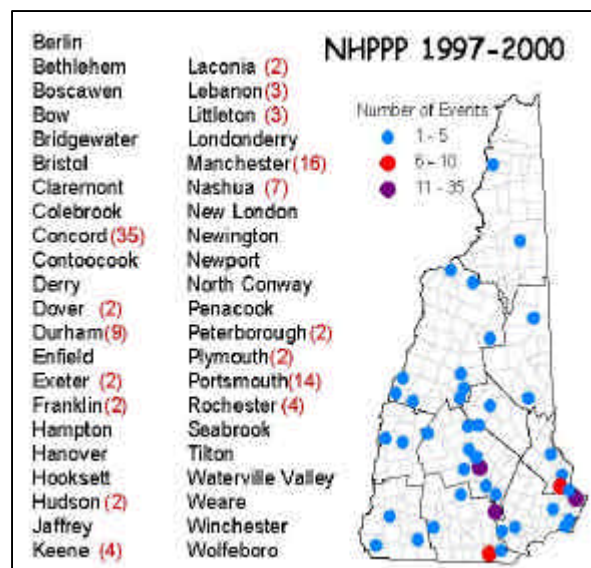
P2 Training

NHPPP performs many presentations and workshops throughout the year. Generally, these presentations are by request, and often NHPPP is invited back year after year for “repeat performances.” During the reporting period, NHPPP gave 64 presentations to the regulated community, and NH citizens. Over 5,400 pollution prevention documents, such as technical reports, fact sheets and our P2 guide, *Planning for Profits*, were disseminated at these events, which were generally well attended and received positive reviews.

In April of 1999, NHPPP and the New Hampshire Municipal Association (NHMA) organized a series of workshops with EPA-New England titled *Expecting Inspections* designed to help municipal highway garage employees improve their operations, identify P2 opportunities, and avoid potential environmental problems. *Expecting Inspections* was presented in Concord, Littleton, Exeter and Keene.

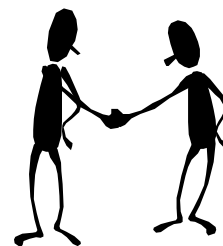
NHPPP also accepts invitations to speak at schools and has given presentations at universities, middle schools, graduate schools and youth centers. It is important to get the P2 message across to students so that they start thinking along the lines of source reduction. Schools usually focus on recycling, which is not as protective of the environment as source reduction.

Distribution of NHPPP’s assistance efforts



B. PARTNERSHIPS

Senate Bill 133 places a high value on creating cooperation between state agencies and the development of partnerships. NHPPP has a long history of building strong partnerships with organizations that complement each other's skills, including the "official" partnerships described below. However, it is the day-to-day partnering with other assistance providers that makes NHPPP so valuable to its customers. NHPPP has developed strong partnerships over the years with organizations such as the University of New Hampshire (UNH), the Business & Industry Association's WasteCap Resource Conservation Network (WasteCap), Dartmouth Hitchcock Medical Center (DHMC), the NH Small Business Development Center (SBDC), the Governor's Office of Energy and Community Services, the NH Hospital Association (NHHA), and more.



A healthy relationship also exists between the Environmental Protection Agency in New England (EPA-New England) and NHPPP, who partner every year through grant activities and special EPA projects. In Dwight Peavey's January 23, 2001 letter to Commissioner Varney, he thanks NHPPP "for consistently excellent work and for embracing a partnership approach to P2 with EPA, as well as with the NH environmental community." The letter can be found as Attachment A.

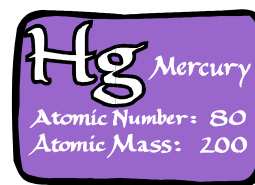
In 1998, NHPPP partnered with the New Hampshire Hospital Association's Foundation for Healthy Communities to provide a "Greening NH Hospitals; Preventive Medicine for the Environment" workshop. Topics included: hospitals' social responsibilities, P2 and waste reduction strategies, obtaining administrative support for your projects, reducing red bag waste, and evaluating treatment technologies. Sixty-five participants representing 21 hospitals attended the interactive workshop.

Partnerships with the Small Business Environmental Assistance Alliance (SBEA2), the P2 in Healthcare Project, and UNH (P2 Partnership) are described in this report, in Sections A, D, E, respectively.

C. MERCURY REDUCTION

Mercury Reduction Task Force and Work Groups

Recently, NHPPP has been closely involved in the state, regional, national and international mercury reduction efforts. In October of 1998, the Department published its *NH Mercury Reduction Strategy* and in 1999, Governor Jeanne Shaheen established the Mercury Reduction Task Force to implement this *Strategy*. The P2 coordinator co-chairs this Task Force. As part of this effort, NHPPP organized and chairs two workgroups: the Public Outreach & Education Workgroup and the P2 in Healthcare Workgroup, which are responsible for making recommendations to the Task Force and implementing action steps called



for in the *Strategy*. NHPPP will be responsible for performing much of the recommended outreach, as well.

NHPPP staff took the lead on developing the *Public Outreach Strategy* prepared by the Public Outreach and Education Workgroup. This strategy identifies specific steps to educate both the populations most at risk from mercury in the environment, and businesses involved in the manufacture or distribution of mercury-containing products. This educational effort focuses on the importance of energy conservation and the proper handling and disposal of the three most common items that contribute large amounts of mercury to our environment: fever thermometers, fluorescent lamps, and thermostats. A draft Outreach Strategy was presented to the Task Force at their October 2000 meeting. NHPPP staff will continue to work with the Outreach Workgroup to implement the action steps identified in the Outreach Strategy.

The P2 in Healthcare Workgroup made recommendations to the Task Force on evaluating the technical and economic feasibility of lowering the emissions limit for hospital/medical/infectious waste incinerators (HMIWIs), and developing recommendations on outreach initiatives to healthcare providers, dentists, laboratories, etc. designed to encourage the use of non-mercury products and procedures.

Mercury Reduction Legislation

NHPPP assisted in the creation of House Bills 625 and 1418 as part of their mercury reduction initiative. HB 625, signed by the Governor and effective on January 21, 2000, establishes a mercury emissions reduction and control program. The bill reduces the amount of allowable mercury emissions for large municipal waste incinerators. The bill also requires DES to conduct a study of the implications of increased mercury levels in the state's ash landfills in order to ensure maximum protection from ash contaminants. HB 1418, signed by the Governor on June 20, 2000 and effective January 1, 2001, prohibits the sale of certain mercury-added products (including thermometers and novelty items), establishes notification and disclosure requirements for permissible mercury-containing products, and establishes limitations on the use of elemental mercury. The bill also prohibits the use of elemental mercury, mercury compounds or mercury containing equipment in NH classrooms. In addition, HB 1418 authorizes the Department to participate in the establishment and implementation of a regional, multi-state clearinghouse and requires manufacturers to notify the Department of their products that contain mercury. The bill also amends the duties of the Mercury Study Committee to include assistance in identification of consumer and health care facility products that contain mercury.



P2 in Healthcare

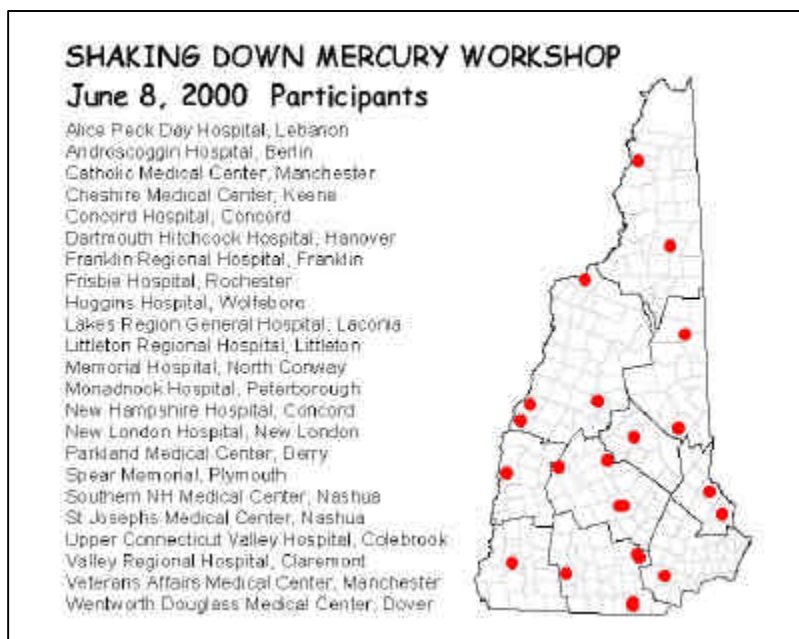
DES' October 1998 *NH Mercury Reduction Strategy* targets the healthcare sector as an important area for mercury reduction efforts. In 1999, the Department formed a partnership to implement projects resulting in the reduction of mercury in the healthcare setting. Participants included: the New Hampshire Hospital Association's Foundation for Healthy Communities (NHHA), UNH, US EPA, WasteCap, Dartmouth Hitchcock Medical Center (DHMC) and Concord Hospital. The goal of the partnership was to increase awareness, reduce use, and improve handling of mercury in the healthcare sector in New Hampshire. NHPPP worked closely with DHMC and Concord

hospitals in developing this program as well as with Alice Peck Day and Franklin Regional Hospital, who were selected as small hospitals to “pilot” the project. A detailed baseline survey designed to measure mercury awareness, use, and handling procedures in healthcare settings was developed and distributed to all hospitals in New Hampshire. Twenty-one of the State’s 26 acute care hospitals responded to the survey. Survey results were compiled and analyzed, then presented at the conference for hospitals (described below) in June of 2000. The survey and conference increased awareness of mercury in the hospital setting. This project fit in well with other state and national efforts to reduce mercury in the healthcare setting, such the efforts between EPA-New England and the American Hospital Association. NHPPP’s work with this sector is ongoing and includes working with the dental sector in 2001.

Hospital Conference

In June of 2000, NHPPP and NHHA hosted a conference for hospitals on mercury reduction in the healthcare setting titled, “Shaking Down Mercury.” Building on the 1998 “Greening NH Hospitals” workshop (showcased under section “B. Partnering,” above) which presented the big picture of waste reduction, this conference focused specifically on reducing mercury in the healthcare setting. New England speakers included hospital representatives, a Sustainable Hospitals Project representative, and state and federal regulatory agency staff. Morning sessions focused on reducing the amount of mercury in hospitals, while afternoon sessions focused on properly handling mercury that can’t be eliminated from the healthcare setting. One session presented a “worst case” story illustrating the huge costs of cleanup and enormous liability resulting from mercury spills; prevention really does pay!

This conference raised the awareness of the problem of mercury within hospitals, and provided an excellent networking opportunity for the healthcare workers. More than 60 members of the healthcare community, representing over 30 healthcare facilities, attended the conference. The audience was composed of a broad mix of hospital personnel, each having a role in the hospital’s environmental affairs, including representatives from: health and safety, infection control, process improvement, bio-safety, clinical engineering, environmental services, industrial hygiene, plant operations, education, maintenance, housekeeping, and materials management.



Environmental Merit Award

EPA- New England selected the NH DES Mercury Reduction Initiative (the Initiative) to receive an Environmental Merit Award in recognition of the exceptional work and commitment to the environment in 2000. This annual award recognizes outstanding environmental advocates who have made significant contributions toward preserving and protecting natural resources. The Initiative, which includes all the efforts described in this section, “has shown innovation, leadership and bottom-line results in reducing mercury pollution across the Granite State.... In less than three years, the team has already achieved a 37 percent reduction in in-state emissions and it fully expects to achieve its 50 percent goal by 2003.”

New England Governors/ Eastern Canadian Premiers

The P2 coordinator is also involved in Northeastern and international efforts to reduce mercury. Under the auspices of the New England Governors / Eastern Canadian Premiers, a Regional Mercury Task Force was formed in 1998 and meets quarterly to work on international mercury reduction efforts. Progress to date includes developing model legislation to reduce mercury in consumer and commercial products, numerous outreach and education efforts, and significant reductions in mercury emissions from major source categories.

D. ANNUAL OUTREACH EVENTS

While NHPPP maintains a certain amount of flexibility to meet the ever changing needs of its stakeholders (both within and outside of the Department), there are a number of core activities that NHPPP performs annually. These activities, described below, are performed each year to provide assistance to the NH business community.

Governor’s Award

Each spring since 1995, the NH Governor’s Award for Pollution Prevention has recognized businesses, industries and other organizations that have successfully reduced (or eliminated) waste at the source. Applications are evaluated on the pollution prevention “quality” of their project, how well the project followed the P2 hierarchy, how well P2 has become company-wide corporate philosophy, and how well the success of the project was measured.



The level of commitment and leadership in P2 shown by the company, and the benefits to the workers, community and environment are also evaluated. Additionally, applicants must be in good standing with environmental regulations. Award winners are announced by the Governor at the annual pollution prevention conference. During the past six years, there have been 18 award winners and 12 honorable mentions. Winners have included a small company with only six employees, small and large hospitals, municipalities, the United States Postal Service, and some of the largest manufacturing operations in the state. Together, these businesses and organizations have reduced significant amounts of solid and hazardous wastes and saved millions of dollars.

Award winning projects from the 2000 Governor’s Award for Pollution Prevention included:

- Aavid Thermal Products’ company wide process of continuous improvement and pollution prevention program that saved the Laconia company an estimated \$260,000 the first year, primarily by reducing reject rates for one product;

- Graphic Printers' P2 project that involved switching from regular inks to “stay open” inks that dry from a chemical reaction with the paper instead of solvent evaporation. The new inks eliminated the need for solvents, and reduced waste ink by 85%. Graphic printers has only six employees, which illustrates that P2 can benefit any size company.
- NH Ball Bearing's P2-oriented Environmental Management System (EMS) that, upon implementation, reduced their Peterborough facility's hazardous waste generation by 93% from 1992 to 2000, and saves \$580,000 annually on reduced water costs.



New Hampshire Ball Bearing (NHBB) accepting their 2000 Governor's Award for Pollution Prevention. Pictured from left to right are Sara Johnson of NHPPP, Chris Rawnsley of NMB-USA (NHBB's parent company) Governor Jeanne Shaheen, and Patti Carrier of New Hampshire Ball Bearing.

Annual P2 Conference

For the past nine years, NHPPP and UNH have provided a pollution prevention conference with assistance from many other partners (including: SBTAP, EPA-New England, SBDC, the Governor's Office of Energy and Community Services, WasteCap, and the Department of Resources and Economic Development (DRED)). The conference is sponsored in part by NH businesses. The conference draws participants from all over New England, and has exceeded 550 participants during the four year reporting period. Conference sessions have included topics ranging from Environmental Management Systems and ISO 14000 to energy conservation to global warming. Each year the conference ends with a very popular state and federal regulatory update session. Governor Jeanne Shaheen has given the welcoming address at this conference every year during the reporting period and often has presented the Awards.

Pollution Prevention Partnership



Each year, NHPPP partners with the University of New Hampshire (UNH) to coordinate a summer internship program with NH companies and organizations and EPA- New England. Participating students are required to take a 10-week long training course on P2 offered by the Dept. of Chemical Engineering. NHPPP provides several classes for the course each year, and coordinates the other lectures with UNH. Most of the speakers are from the advisory committee described below.

The students who participate in the program receive valuable “real world” experience by working on actual projects within participating companies. These companies and organizations

are introduced to pollution prevention and benefit from relatively “cheap labor” to complete a P2 project they otherwise might not attempt. Some companies request an intern because they have a specific project that they need assistance with; other companies request an intern to bring in fresh ideas and a pollution prevention perspective.



P2 intern and chemical engineering student, April Duhaime, learns about the use of lasers to cut metal during a facility tour.

To date, 65 interns have been placed at 37 companies and organizations in NH, saving them more than \$2.5 million through P2 projects. Most host companies have been very satisfied with the internships, and request an intern from the program year after year. As of the summer of 2000, there were more requests for interns than students available, illustrating the success of the program. At the end of the summer, the interns make professional presentations on their summer P2 projects to an audience of participating companies, Department and EPA- New England staff, UNH representatives, and the other interns. Recent P2 projects have included:

- Metal bearing waste stream evaluation
- Mercury reduction at hospitals
- Metal finishing research
- HCL Etch process research
- Reverse osmosis pre-cleaning
- Nitric acid recycling
- Electrodialysis of copper

This partnership also involved an advisory committee that met quarterly, from 1996-1998, to share information and pollution prevention experiences, and to provide networking opportunities for companies that have implemented P2 projects. The committee was composed of NH businesses, state and federal regulatory agency staff, and UNH. Partners included many of the pollution prevention and small business assistance providers that NHPPP regularly works with, including: NH Department of Resource and Economic Development's (DRED) Recycling Market Development Program, NH Manufacturing Extension Partnership, Northeast Resource Recovery Assoc, WasteCap, Businesses for Social Responsibility, and SBDC, in addition to the Department's NHPPP and SBTAP.

P2 Week

To increase P2 awareness throughout New Hampshire, NHPPP actively promotes National Pollution Prevention Week. Each year during the reporting period, a joint resolution proclaiming P2 Week has been organized by the Northeast Waste Management Officials' Association (NEWMOA) and has been signed by regulatory agency commissioners in all six New England states and New York and EPA-New England and Region 2 administrators. The resolutions proclaim P2 week, present each year's theme, and encourage participation in planned activities.



Each year, NHPPP develops a NH P2 Week Proclamation signed by the Governor. This past year (2000), the Department of Health and Human Services, and EPA-New England and Region 2 also signed the state proclamation with the theme, *Healthy Planet = Healthy Kids*. Activities for these events have included: press events with EPA, EcoWatch “advertisements” on TV (described below), and P2 displays and presentations offsite, including displays at local libraries.

E. SMALL BUSINESS

Small Business Environmental Assistance Alliance (SBEA2)

In 1998, NHPPP partnered with the UNH’s Chemical Engineering Program, SBDC, and EPA-New England, and with support from other relevant organizations, formed the Small Business Environmental Assistance Alliance (SBEA2). The main goal of the SBEA2 is to ensure that P2 and assistance programs in New Hampshire are networked to better leverage resources and expertise to best serve NH small business.



As part of the SBEA2, NHPPP used PPIS funding to provide the SBDC with an environmental counselor to assist NH small businesses with pollution prevention activities. Educating small businesses on pollution prevention techniques complements the financial assistance the SBDC already provides to the small business community. Small businesses rarely understand the financial savings and other advantages resulting from implementing pollution prevention projects. The position was established at the SBDC with the assumption that some businesses that want pollution prevention assistance may not be comfortable contacting the NHPPP, since NHPPP is housed within the state environmental regulatory agency and may be viewed as another “state” enforcement program. From 1998-2000 the SBEA2 provided assistance to 18 companies, and worked with NHPPP in 7 additional assistance efforts. The SBEA2 funded the position from January 1998 to January 2000. The position is currently funded by other grant funding. The environmental counselor’s duties include:

- evaluate the needs of small businesses and provide environmental counseling;
- network and make referrals to other assistance providers, as appropriate;
- coordinate onsite environmental assessments and follow-up;
- coordinate workshops and trainings;
- train SBDC financial counselors on P2.

The environmental counselor and the core project team also developed a three day training session for SBDC counselors and other assistance providers. Sessions provided the attendees with an introduction to the SBEA2, an overview of environmental laws and regulations, an overview of pollution prevention techniques, and an introduction to environmental management systems. Sessions also included an overview of the assistance resources available to small businesses and a lively discussion on the environmental needs of small business clients.

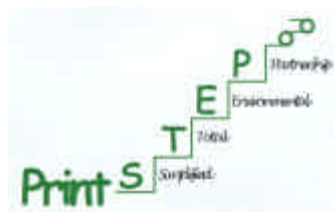
Small Business Technical Assistance Program (SBTAP)



NHPPP also works closely with the Department’s Small Business Technical Assistance Program (SBTAP) to help small businesses meet and exceed compliance with state and federal

air regulations. As a result of the 1990 Amendments to the Clean Air Act Amendments (CAAA), many small businesses have been brought into the formal environmental regulatory process. Examples of small businesses that are affected by one or more of the programs under the CAAA include auto body shops, dry cleaners, furniture manufacturing and repair facilities, gasoline service stations and print shops.

Small businesses (companies with less than 100 employees) have, in many cases, limited financial and technical resources available to understand and fully comply with complicated environmental regulations. In order to comply, they need low or no-cost compliance assistance. The Department responded to this need by establishing the SBTAP to work with small business owners to develop solutions to environmental problems. This non-regulatory program helps businesses understand the regulations and which requirements pertain to them. SBTAP provides P2 information/assistance to reduce the amount of emissions and waste generated by the business and address their environmental issues. This year the SBTAP and NHPPP are working with NH printers on the PrintSTEP project, described below.



PrintSTEP

In 2000, the Department launched an initiative to assist small printing businesses to meet their regulatory obligations, while practicing cost effective pollution prevention techniques. New Hampshire was one of three states selected by the US EPA to conduct this innovative pilot program called Printers Simplified Total Environmental Partnership, or “PrintSTEP.” SBTAP runs the NH program, with assistance from NHPPP.

The initiative will enable the Department to test new approaches in making the regulatory system more effective and flexible for the printing industry. Participation in the program is entirely voluntary and does not reduce any of the standards that must be met. The program does, however, promote the reduction of government oversight at printing facilities, offers special compliance tools, enhances public involvement, and improves the reporting procedures for environmental permit holders.

PrintSTEP was developed as part of EPA’s “Common Sense Initiative” to allow federal, state, and business to develop *consensus* recommendations for improving environmental management strategies. PrintSTEP pilot programs do not change the existing emission or release standards for air, wastewater, and hazardous wastes. They do, however, allow for changing the process of implementing those standards.

F. ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS and ISO 14001)

An EMS is a formal set of procedures and policies that defines how an organization will manage both its potential impacts on the environment, and the health and welfare of its workers and nearby community. When implemented, an EMS has the potential to move a facility *beyond* compliance with environmental regulations. A good EMS will utilize pollution prevention techniques, with the objective of continually reducing the facility’s adverse impacts on the environment and improving worker health and safety. Furthermore, by adopting a high-quality

EMS, the facility is likely to discover many opportunities to reduce wasteful uses of resources, thus saving money and otherwise enhancing its economic performance while reducing impacts on the environment. The most common EMS used is the internationally accepted ISO 14001 model. DES offers a much simpler version of an EMS designed for small business through their P2 Planning Guide.

P2 Planning Guide

In response to the needs of small business, NHPPP developed a handbook to help NH businesses evaluate their environmental impacts and identify pollution prevention opportunities at their facilities. The guide, *Planning for Profits; a Guide to Pollution Prevention for New Hampshire Businesses*, published in January of 1999, is multi-media in nature, and outlines a step-by-step process for evaluating a company's processes and undertaking pollution prevention activities. While the guide was designed to specifically target small manufacturing operations, it is applicable for a wide range of businesses. *Planning for Profits* can be used by any type or size of manufacturing facility, as well as any other organization, hospital, municipality, offices or even retail stores to reduce waste. Environmental consultants and other third party auditors have also found the guide useful. A typical example of the value and usefulness of *Planning for Profits* is Aavid Thermal Products of Laconia. (See box on following page)



Approximately 1,230 copies of the guide have been distributed to more than 870 businesses and organizations. *Planning for Profits* is often sent by request, and copies are made available at many NHPPP events.

Some businesses and organizations may view adoption of an EMS as an opportunity to send strong signals to regulators and the public about their commitment to maintaining environmentally friendly operations. Environmental health and safety regulators at the state and federal level have been closely watching the development of EMSs. A facility that adopts an EMS should, eventually, conform to all applicable environmental, and health and safety regulations, requiring less oversight by governmental regulatory agencies. Some government officials therefore see EMSs as an opportunity to reduce the regulatory burdens of these facilities.

NH Business uses *Planning for Profits* to increase profits

Aavid Thermal Products used *Planning for Profits* to assist in their continuous improvement and pollution prevention programs. These programs resulted in a 2000 Governor's Award for Pollution Prevention. The team used the guide to identify and evaluate different pollution prevention opportunities at their facility. One project saved the company an estimated \$260,000 alone! Details include:

- Aavid manufactures a variety of products that address thermal issues at all stages of production design for their customers. One product they manufacture is a 70-pound aluminum heat sink that is an integral part of the drive system for the Bay Area Rapid Transit "people mover" in San Francisco, California. The production processes for this product were reviewed for pollution prevention opportunities, using *Planning for Profits*.
- The pollution prevention projects implemented by Aavid involved: source reduction, waste elimination, water conservation and recycling. Aavid saved an estimated **\$260,000** in avoiding rework costs on the heat sinks and another **\$8,000** in energy costs on their anodizing line alone.
- Project benefits include: substitution of more environmentally friendly products, decreased labor costs, reduction of ozone depleting compound emissions, improved worker safety and morale, and community involvement.

G. PUBLICATIONS/PRODUCTIONS

Some of NHPPP's most effective outreach tools are its numerous publications and productions, developed for both broad and very specific audiences. A few of NHPPP's larger efforts are presented below. During the reporting period, over 45,000 documents were distributed throughout NH. NHPPP's *Planning for Profits* was presented in Section F.

P2 Newsletter

Wastelines is NHPPP's quarterly newsletter created and distributed since 1993. The newsletter was created to educate the regulated community on pollution prevention opportunities and regulatory issues and updates. Recent *Wastelines* issues have included articles on Environmental Management Systems, pollution prevention in healthcare, the PrintSTEP initiative, where to find P2 information on the Internet, reducing waste in the hospitality industry, the Governors Award for Pollution Prevention, and the Mercury in Products bill.



Wastelines also provides a calendar of events and is available in hard copy, or on NHPPP's website at: <http://www.des.state.nh.us/nhPPP/wlnews.htm>. The newsletter is sent to 870 recipients, four times a year, and is also available at many of NHPPP's events. During the reporting period, fourteen issues of *Wastelines* have been published, and more than 12,000 newsletters distributed.

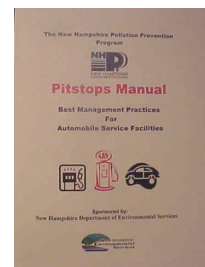
P2 for Automotive Repair Shops

Automotive repair shops are generally small businesses that create a relatively large amount of hazardous waste. To address the needs of the automotive service industry, NHPPP developed an automotive curriculum for teachers and a technical manual for automotive service technicians (*Pitstops*).



Development of the Automotive Curriculum involved conducting outreach and on-site assistance for automotive programs at NH's vocational schools and technical colleges. NHPPP used Pollution Prevention Incentives for States (PPIS) grant monies to develop a curriculum for use by automotive training programs in NH. The curriculum, *Pollution Prevention for Automotive Service Technicians*, presents pertinent environmental issues that may arise when servicing automobiles. The curriculum begins by introducing regulatory and pollution prevention concepts, then presents detailed information on the regulations involved with, the proper handling of, and how to prevent, the ten (mostly hazardous) wastes commonly generated by these types of facilities. Issues such as floor drains, compliance inspections, and emergency spill procedures are also discussed. The curriculum includes teacher's outlines, overheads, and quizzes to be used in the teaching process. There are approximately 30 automotive service training programs in NH. Several of those programs are using the curriculum developed by NHPPP.

The *Pitstops* manual was developed by NHPPP for use by automotive service facilities because the auto repair business involves handling and managing a variety of regulated materials that can be harmful to the auto technician's health and to the environment. Routine maintenance can generate used motor oil, refrigerants, paints, solvents, spent antifreeze, used tires and batteries that require proper handling, recycling and/or disposal. This informative guide covers pollution prevention techniques and best management practices for:

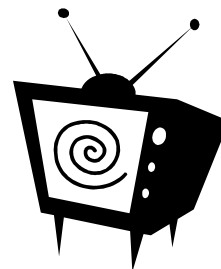


Absorbents/ Shop Wipes	Drums (55 gallon storage)	Scrap Metal
Aerosol Cans	Freon	Storage Tanks
Antifreeze	Oil Waste Streams	Used Oil
Asbestos Brake Pads	Paint Booth Filters	Used Oil Filters
Batteries	Painting Wastes	Used Tires
Carburetor Cleaners	Parts Washing Solvent Waste	

A free copy of NHDES's "*Pitstops: An Environmental Guide for Automobile Service Facilities*" can be obtained by calling 1-800-273-9469, e-mailing nhppp@des.state.nh.us, or by visiting <http://www.des.state.nh.us/nhppp/pitstops.pdf>. The document was updated in 1998.

EcoWatch Spots

NHPPP has created four EcoWatch spots (public service announcements) for television during the reporting period. Eco Watch is a 40 second message shown throughout the day for a period of about two weeks. EcoWatch is sponsored by the Society for the Protection of New Hampshire Forests and WMUR, ABC's local affiliate in Manchester. NHPPP worked with WMUR on the script and film footage. The NHPPP segments are an excellent opportunity to promote P2 to consumers and reach the general public. The EcoWatch spots have promoted:



- proper disposal of household hazardous waste;
- pollution prevention and environmentally friendly purchasing;
- mercury reduction: fish advisory, smart purchasing, and proper disposal; and
- cleaner (4-stroke) outboard marine engines (developed with the Water Division).

Metal Finishing Video

In 1997, NHPPP partnered with UNH and EPA-New England to produce a videotape to help metal finishers reduce their generation of waste. The video, "Pollution Prevention and the Bottom Line" illustrates the financial benefits of P2 to metal finishers. Pollution prevention opportunities for this sector were outlined in the following four areas: materials accounting, cleaning and degreasing operations, the plating line, and waste management. Many of the P2 opportunities presented in the video required little capital and were relatively easily implemented. The video also showed newspaper clippings of environmental problems and disasters from metal finishers that did not conduct their environmental affairs properly and did not use P2 concepts.

Wood Finishers -Workshops, Library, Video and Manual

In 1997, NHPPP received PPIS funding from EPA-New England to provide assistance to NH wood finishers. NHPPP partnered with the SBDC to perform outreach to the almost 1,000 wood finishers in NH, most of which are small businesses. NH wood finishing sectors included:

- | | |
|----------------------------|-----------------------|
| • Lumber and Wood Products | • Brooms and Brushes |
| • Furniture and Fixtures | • Burial Caskets |
| • Boat Building and Repair | • Furniture Repair |
| • Toys | • Furniture Strippers |
| • Musical Instruments | |

In the fall of 1998, the Department sponsored two workshops for wood finishers. One conference was offered in Manchester and one in Littleton. The workshops focused on multi-media P2 opportunities and compliance issues for wood finishers. Sessions were designed to address wood finishers' primary environmental concerns, and included topics such as air, water and waste regulations, pollution prevention opportunities, NH case studies, safety and health issues, and assistance resources. EPA-New England experts, state officials, consultants, NEWMOA staff, OSHA representatives, and coating vendors presented the latest information on regulations, technologies and best management practices to provide a safe, legal and profitable work place. The conferences were attended by 63 wood finishers and approximately 500

pollution prevention documents were distributed. In addition, NHPPP collected information to create a library on alternate P2 technologies for wood finishing. The technical library includes 75 articles, fact sheets, reports and manuals.

EPA-New England also developed a video for wood finishers. NHPPP provided speakers for the video and helped advertise the video once it was developed. The video is geared towards actual wood finishing facilities, and discusses changes a facility can make in materials, equipment, process efficiency and operating efficiency to reap pollution prevention benefits.



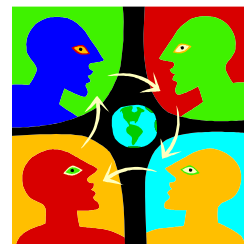
While these projects were ongoing, NEWMOA also received funding to develop pollution prevention manuals for wood finishers for three New England states, including NH. NHPPP worked with NEWMOA to create "A First Place Finish; An Environmental Guide for NH Wood Coaters." The manual was sent to all wood finishers in NH, and several copies were sent to the Wood Products Manufacturing Association and the NH Manufacturing Extension Program.

H. REGULATORY INTEGRATION

NHPPP has implemented several initiatives to encourage integration of pollution prevention within the Department. The following activities were undertaken by NHPPP during the reporting period in an effort to incorporate P2 into daily routines within the Department and into job activities of Departmental employees. An example of the former is using the Green Team to increase recycling of paper and other materials within the Department's buildings; an example of the latter is to use P2 concepts as a tool to do the Department's job more effectively when interacting with the regulated community.

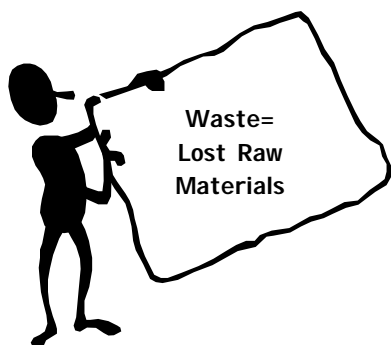
P2 Strategy & Task Force

In an effort to foster pollution prevention in the Department, a Multi-Media Pollution Prevention Task Force (Task Force) was created in May of 1992. The Task Force meets periodically and is composed of representatives from each of the Department's three Divisions (Air Resources, Water, and Waste Management), as well as the Commissioner's Office. The Task Force's objective is to "direct, coordinate and promote strategies which prevent pollution of air, land and water. Such strategies include: toxics use reduction, waste minimization and best management practices to conserve natural resources and protect human health and the environment." The Task Force chose to articulate its findings and recommendations in its 1995 "Pollution Prevention Strategy" (*P2 Strategy*), which serves as a foundation for ongoing and future pollution prevention initiatives. The *P2 Strategy* examines topics such as data and information management, education and outreach, targeting pollution prevention activities, institutionalizing prevention concepts, and legislative and regulatory issues.



The P2 Strategy provides background on existing Departmental pollution prevention efforts, areas where prevention concepts could be further incorporated into Department operations, and specific options and recommendations for expanding pollution prevention activities. All the

media specific divisions within the Department incorporate P2 concepts; NHPPP is housed in the Waste Management Division, the SBTAP (detailed in Section E, *Small Business*) is housed in the Air Resources Division, and NHPPP works with many of the Water Division's programs (including their Drinking Water Source Protection, National Pollution Discharge Elimination System, Industrial Pretreatment, and Watershed Management programs).



P2 Training

In the fall of 1999, NHPPP held five P2 training sessions for Departmental staff. All staff that had not had the initial P2 training offered by NHPPP in 1994 and staff hired since then were invited to attend. Pollution prevention concepts were introduced using real world examples of NH businesses that have used P2 to solve environmental problems and save money. Over a hundred staff attended these trainings, and reviews of the sessions were very positive. NHPPP encourages staff to incorporate pollution prevention activities into their work and home life. These trainings

concluded former Commissioner Robert Varney's request to have all 450 Department staff trained in pollution prevention concepts.

P2 Week

To increase P2 awareness throughout the Department, NHPPP actively promotes P2 Week, which is also celebrated nationally. During the reporting period, NHPPP has held numerous Departmental staff trainings; exhibited displays on source reduction, environmentally friendly purchasing, and recycling; e-mailed P2 "tips of the day" to all 450 Departmental employees; included P2 messages in paychecks that are sent to all of the approximately 11,000 state employees; and created a Departmental calendar of P2 events. Events outside the Department were presented above in "Assistance to the Regulated Community," Section A.

Letters of Deficiency (LOD)

Letters of Deficiency (LOD), are sent to businesses after an inspection by Department regulatory enforcement staff identify minor regulatory problems. These letters include wording that encourages the company to use pollution prevention to fix those problems. The letter provides contact information for NHPPP and provides information on where they can find technical information outside the Department. After the initial LOD is sent, NHPPP sends a follow-up letter to the company, encouraging P2 and providing additional assistance information. During the reporting period, 142 letters were sent to violating companies, and more than 700 P2 documents were distributed to fulfill these requests.

Supplemental Environmental Projects (SEPs)

The Department also encourages the use of Supplemental Environmental Projects (SEPs) in enforcement cases against violating companies. SEPs are environmentally beneficial projects that a company agrees to perform as part of a Department enforcement action. The SEP offsets part of the penalty and involves a project that the company is not otherwise required to perform. SEPs activities that use pollution prevention benefit the company (helps them stay in compliance, reduce waste and save money), the Department (less time and effort spent to regulate companies that are in compliance) and the environment (less pollution generated).

Green Team

The Department's Green Team was formed in 1995 to promote P2 and explore improvements to the Department's use of resources and disposal of waste. The in-house volunteers encourage the Department to provide environmental leadership by minimizing its environmental impacts, including: energy conservation, water conservation, toxic use reduction, solid waste reduction, and recycling.

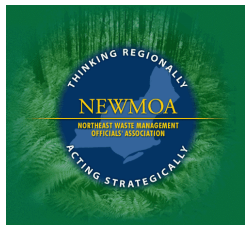


The Green Team has been involved in a number of very successful initiatives, including procurement of recycled content office supplies, organizing a re-use area for office supplies, creating an extensive recycling program for office waste (paper, glass, plastic and aluminum) and making recycled content mugs available in the cafeteria, as an alternative to Styrofoam. The Green Team also supported the procurement of alternative fuel vehicles; the Department currently owns four and has two more on order.

I. REGIONAL AND NATIONAL EFFORTS

NHPPP is involved in a number of efforts to promote and coordinate P2 activities throughout the Northeast and the nation.

Northeast Waste Management Officials Association (NEWMOA)



On a regional level, NHPPP is very active in NEWMOA. The Northeast Waste Management Officials' Association (NEWMOA) is a nonprofit, nonpartisan interstate association that has a membership composed of the hazardous waste, solid waste, waste site cleanup and pollution prevention program directors for the environmental agencies in Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, Vermont, and recently, New Jersey. NEWMOA was established by the Governors of the

New England states as an official regional organization to coordinate interstate hazardous and solid waste, and pollution prevention activities. EPA-New England formally recognized NEWMOA in 1986.

NEWMOA coordinates regional P2 activities among various state environmental agencies in New England, provides expertise to those agencies, hosts workshops and regional meetings, develops technical resources for the P2 community, and hosts the Northeast (NE) States Pollution Prevention Roundtable. NHPPP has been a member of this Roundtable and worked with NEWMOA for over 10 years, and fully supports the organization.

NEWMOA also sponsors a number of workgroups to coordinate efforts in the New England states on specific topics. NH has been involved in the following workgroups:

- P2 in Air Permitting (P4)
- P2 Week
- Mercury
- Marina Assistance
- P2 Information Dissemination
- P2 Innovative Technology
- P2 Metrics and Compliance
- Roundtable Steering Committee

National Pollution Prevention Roundtable (NPPR)

NHPPP is very active in the National Pollution Prevention Roundtable (NPPR), which coordinates state P2 activities across the nation and provides a national forum for promoting pollution prevention efforts. The organization's members are composed of the country's preeminent P2 experts from federal, state and local government P2 programs, small business assistance networks, non-profit groups, industry associations, and consulting firms.



NPPR hosts two conferences annually within the US, in addition to their international events. In May of 2000, the annual NPPR conference was held in Boston and NHPPP was jointly responsible for assembling a tract on P2 in Healthcare (with MA DEP). NHPPP also monitored a session and presented information on NH's mercury reduction efforts. NPPR is also very active in international P2 trainings.

Multi-State Working Group (MSWG)

In 1996, US EPA, state regulatory agencies, businesses, universities and non-profit organizations formed the Multi-State Working Group (MSWG) to collect and analyze data on the environmental and economic results of implementing an Environmental Management Systems (EMSs) into the National Database on EMSs (NDEMS). The Department is a member of the MSWG, and is working to gather data under the state pilot projects with facilities adopting EMSs.

Five NH organizations are participating in the MSWG project with the Department and have worked to develop EMSs at their facilities. Participants include the NH Air National Guard Unit (located at PEASE), the PEASE Development Authority, Fenris Technology (a small R&D firm also at PEASE), Foss Manufacturing (in Hampton) and Venture (formerly Bailey Manufacturing, in Seabrook). These organizations provide data on their environmental performance as it relates to their EMSs, and this data from NH is then fed into NDEMS. The Department is very appreciative of these organizations' participation.

J. EPA REVIEW OF DES P2 AND ASSISTANCE ACTIVITIES

In response to a 1998 GAO request, EPA-NEW ENGLAND performed a review of all New England state environmental regulatory and assistance programs. EPA reviewed the Department's assistance and regulatory and assistance programs, including NHPPP. EPA released a final report in March of 1999 titled "Final Review of the State of New Hampshire's Environmental Enforcement Programs and Assistance & Pollution Prevention Programs." This review included NHPPP, SBTAP and the many other assistance positions located within the media-specific divisions of the Department. Findings in EPA's March 1999 report were quite positive, and identified the shortage of staff and resources as the only real criticism.

EPA's Findings and Recommendations include:

- The Department's 1995 Pollution Prevention Strategy provides actions and recommendations to institutionalize P2 concepts and practices within the Department, including staff training, resource allocation, funding sources, and program structure.

The Department should continue its practice of coordinating its strategic planning efforts among the assistance and regulatory programs, as planned in the strategy.

- Overall Departmental coordination among assistance and pollution prevention programs may benefit from establishing a pollution prevention position within the Water Division, similar to the pollution prevention positions already existing in the Air and Waste Divisions.
- EPA recommends that the Department consider the need for additional resources dedicated to compliance assistance and pollution prevention within Departmental Divisions to support direct assistance, outreach and associated initiatives.

VII. P2 IN THE NEW MILLENNIUM

Pollution prevention assistance has evolved considerably since the concept first became widely known in the early 1990's. State and federal agencies need to be able to address changing environmental issues as well as changing customer needs. In the new millennium, NHPPP will need to focus on certain key areas to provide the best protection for New Hampshire's environment while ensuring optimum performance by its customers. These include:

Comprehensive Environmental Management Systems (EMSs)

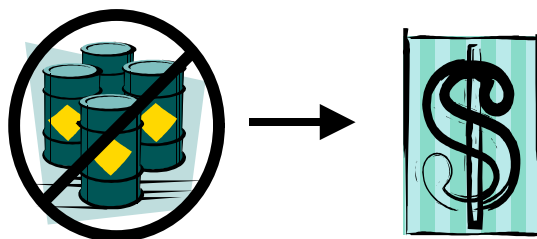
Today, many companies are developing comprehensive EMSs to replace individual programs to better address regulatory issues, quality management, pollution prevention and worker health and safety. This makes sense because each program requires the same basic implementation steps (team organization, process analysis, identification and evaluation of alternatives, project implementation, and progress measurement). Rather than promoting pollution prevention as a stand-alone program, NHPPP is promoting the EMS process which focuses on pollution prevention, but includes the other internal review issues. Several organizations have already concluded that combining separate programs is easier to implement and more effective to operate and are therefore promoting comprehensive EMSs. For example, Nike, Inc. has demanded that each of their 750 suppliers adopt a comprehensive EMS. Nike is helping these small manufacturing companies to develop and implement "Environmental Health and Safety Management Systems" that will improve their performance while supporting Nike's overall ecological goals.

Merging of Compliance and Technical Assistance Efforts

Traditionally, state and federal environmental personnel have been divided into two groups: regulatory compliance staff, the "black hats," who act as environmental police, and the assistance staff, the "white hats," who generally provide confidential assistance and advice without the threat of regulatory fines and penalties. To maintain the confidence and trust of businesses, the assistance staff carefully kept a good distance between themselves and the enforcement staff. Today, the black hats are increasingly providing assistance without enforcement, and the white hats are providing more regulatory information along with their pollution prevention assistance. As their relationship with the regulatory staff improves, businesses are now requesting "gray hat" assistance from NHPPP and this trend will likely continue to grow.

Focus on Persistent Bioaccumulative Toxics (PBTs) through Risk Assessment

Limited agency resources control the amount of assistance and enforcement that can be provided. Therefore, agencies need to selectively focus their efforts on issues that are most important to their stakeholders and provide the greatest environmental and public health benefit. Using information from risk assessments is one way to focus these efforts. Persistent Bioaccumulative Toxic (PBT) substances have been an area of focus for EPA-New England and the Department because their characteristics make a small amount of them extremely dangerous to New Hampshire's environment and population. Mercury, one of the most offensive PBTs, has been the focus of a large portion of NHPPP's resources for this reason. The trend of effectively focusing limited NHPPP resources on the most important environmental and health issues will continue in the future.



VIII. CONCLUSION

New Hampshire is getting an extremely good return on its investment by funding NHPPP. NHPPP has similar outputs to other New England states' P2 programs that have at least twice the staff and budget. NHPPP needs to maintain its current level of funding to continue programs that address the needs of the NH small business community and needs increased funding to address emerging issues and initiatives, such as hazardous wastes in our schools and the *New Hampshire Dioxin Reduction Strategy*. NHPPP should also be ready to address emerging issues within the state, and new initiatives in conjunction with EPA-New England.

Pollution Prevention clearly benefits both NH businesses and the environment. NH companies are using P2 and Environmental Management Systems today to increase their profits. P2 helps companies improve their bottom line by eliminating waste and wasteful practices and encouraging a more efficient use of raw materials and resources, including water and energy. P2 protects the environment by reducing or eliminating hazardous waste generation, toxic water discharges and hazardous air emissions. One of the best ways for businesses to explore their pollution prevention options is to contact NHPPP.

ATTACHMENT A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

January 24, 2001

Dr. Philip O'Brien, Director
Waste Management Division
Department of Environmental Services
State of New Hampshire
P.O. Box 95
Concord, NH 03302-0095

Dear Dr. O'Brien:

I would like to take the opportunity to acknowledge the accomplishments of the pollution prevention office at NHDES over the past six years through grants provided by EPA.

My colleagues and I have always enjoyed a productive and positive relationship with the NH P2 program. I have been impressed by the outcomes which have resulted from the ambitious projects undertaken by the NH P2 program. I also appreciate the fact that NH consistently produces excellent work products which have improved the environmental performance of various industrial sectors. Although NH has a small P2 staff compared with other New England states, the volume of valuable outreach materials, on-site assistance, and P2 education provided to many important sectors has been remarkable. With limited funds, NH has always made the most of the grant money provided to the program.

On behalf of EPA, I would like to recognize the effort and commitment necessary to establish and maintain the New Hampshire Pollution Prevention Partnership. This unique partnership was established through the EPA Pollution Prevention Incentives for the States (PPIS) grant awarded jointly to the New Hampshire Department of Environmental Services (NHDES) and the University of New Hampshire (UNH) in 1994. The New Hampshire Pollution Prevention Partnership (NH P2 Partnership) is comprised of industry, academia, government, interest groups and business associations. The goal of the NH P2 Partnership is to promote and integrate pollution prevention into all activities in New Hampshire.

There are many other success stories that deserve recognition, including the following:

- the NH Pollution Prevention Conference, now in its 9th year, which continues to be a great success and an important event for the environmental community in New Hampshire;

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

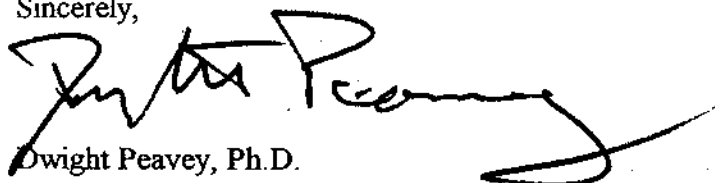
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- the DES/UNH Internship Program which was one of the specific activities that resulted from the creation of the P2 Internship Program based at the University of New Hampshire College of Engineering; and
- the EPA/DES/UNH CLEAN initiative which offered small and medium-sized businesses free, on-site compliance and pollution prevention audits;

The NH P2 program has also been an asset to the EPA P2 program by providing timely summaries and valuable case studies which allow other states to emulate the work that is being done in New Hampshire. It is very important to not only produce great work, but also to document and measure P2 accomplishments, both economically and environmentally, so that others may benefit from the knowledge that has been gained.

Thank you for your consistently excellent work and for embracing a partnership approach to P2 with EPA, as well as with the New Hampshire environmental community. It has been a pleasure to work with you over the years. I fully support and endorse expanding this program so that the State of New Hampshire may benefit further from the excellent services and assistance that is offered by the NH P2 program.

Sincerely,



Dwight Peavey, Ph.D.
Senior Scientist
Small Business Ombudsman

cc: Robert Varney, Commissioner
NHDES

Stephanie D'Agostino, P2 Coordinator
NHDES

Sara Johnson, P2 Program Manager
NHDES

JAN 26 2001